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March 26, 2025

By ECF

The Honorable Margaret M. Garnett
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *McCrary v. Merrill Lynch, Pierce, Fenner & Smith Inc.*, Case No. 1:23-cv-10768-MMG-BCM

Dear Judge Garnett:

We represent plaintiff Margaret McCrary. Since the March 18, 2025 conference, the various plaintiffs have discussed a potential agreed-upon consolidation structure. However, given the multiple constituencies involved, the process is taking longer than anticipated, and may ultimately be unsuccessful. Moreover, if the plaintiffs reach resolution, we anticipate soliciting defendants' views, which will take additional time.

Accordingly, we respectfully request a one-week extension to the briefing schedule, which currently reflects that i) "McCrary shall file her opposition to Plaintiffs Safron Capital Corp., Campton, Taylor, and Bertonis' letter-motion to consolidate (McCrary, Dkt. No. 50), or the parties shall file a joint proposal regarding consolidation, no later than March 28, 2025," and ii) responses, in the event of an opposition, be filed by April 4, 2025. *See* ECF 52. This is the first request for any extension.

We have conferred with defense counsel and counsel for plaintiffs Safron Capital Corp., Campton, Taylor, and Bertonis, who do not oppose the request.

Respectfully,

/s/ Adam J. Blander
Adam J. Blander

CC: All Counsel of Record

Application GRANTED. It is hereby ORDERED that McCrary's opposition to the letter-motion to consolidate or the parties' joint proposal regarding consolidation shall be due no later than **April 4, 2025**. It is further ORDERED that, should McCrary file an opposition, Plaintiffs Safron Capital Corp., Campton, Taylor, and Bertonis, and Defendants shall file their response(s) to McCrary's opposition no later than **April 11, 2024**. The Clerk of Court is respectfully directed to terminate Dkt. No. 55 and file this order in the Safron (24cv07743), Campton (24cv08629), Taylor (25cv00709), and Bertonis (25cv01601) actions.

SO ORDERED. Date: 3/27/2025.



HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE